August 16, 1977

Mr. Lester Samstag, General Manager
Vista Metals Corporation
13435 Whittram Avenue
Fontana, CA 92335

Dear Mr. Samstag:

This will confirm our inspection of the waste disposal facilities at your Fontana plant on August 11, 1977. The following sources of wastes were reviewed:

1. Blow down water from cooling tower to subsurface disposal system

   You indicated that you are using a chromium-zinc based chemical additive for cooling tower water treatment.

   The chemical analysis of blow down water sample, which you have already submitted, does not include these elements. You are, therefore, requested to submit a supplemental analysis for zinc, total chromium, and phenol for your cooling tower waste water. You indicated that a sample would be taken and these additional constituents analyzed.

2. Tow motor steam cleaning operation

   Since you are discharging wastewater from your tow motor steam cleaning operation to a subsurface disposal system, please provide us with a chemical analysis of this discharge. The analysis should include analysis for phenol in addition to the constituents analyzed for in the cooling tower water analysis, which you have already submitted.

3. Subsurface disposal of sewage

   You stated that total of forty (40) persons are divided over three, eight (8) hour working shifts. These employees use three toilet facilities which are connected to three different septic tanks. You have indicated that waste discharge from the sanitary facilities would be

in the order of 300-400 gallons per day and would essentially be from the toilet facilities. Since the volume of the sanitary wastes is less than 1500 gpd, no waste discharge requirements for this discharge will be necessary at this time.

4. Waste dross

We noticed that the dross (waste) is stored in a covered building as reported by you earlier. As long as this waste product is stored inside and does not come in contact with rain water, and no discharge occurs, water quality will be protected and no requirements will be necessary for these wastes.

The probable mineral limitation which will be included in your waste discharge requirements are summarized below. These tentative limitations are based on the Board's Water Quality Control Plan and reasonable use of water:

Constituents	Allowable Incremental Limitation Overwater Supply	Average Constituent Limitations
Filtrable Residue	230	435 mg/l
Sodium	60	70 "
Chloride	55	60 "
Total Hardness	20	172 "
Sulfate	35	57 "
Fluoride	--	1.0 "
Boron	--	0.5 "
Chromium	--	0.05 "
Zinc	--	0.10 "
Phenolic Material	--	0.01 "

A review of the chemical analysis for your cooling water discharge indicates that you would not be able to comply with most of the mineral limitations outlined above. You are, therefore, requested to provide this office with your plans as to how you expect to comply with the proposed constituent limitations. A time schedule should also be provided which you intend to follow for compliance with these discharge limitations.

We appreciate the time you spent showing us around your plant.

Please respond to this letter by September 6, 1977.

Sincerely,

Hisam A. Baqai
Staff Engineer

MSS/HAB/cl